

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTELLECTUAL VENTURES I LLC  
and INTELLECTUAL VENTURES II  
LLC,

Plaintiffs,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Civil Action No. 11-cv-908-SLR-MPT

**JURY TRIAL DEMANDED**

**SPECIAL VERDICT FORM**

Dated:

We, the jury, unanimously find as follows:

**'144 PATENT**

1. Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility has directly infringed any asserted claim of U.S. Patent No. 7,810,144 ('144 patent)?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

**[IV'S PROPOSED QUESTION]**

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_]

**[MOTOROLA'S PROPOSED QUESTION1]**

For accused devices on Boost Mobile, Virgin Mobile and Sprint network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on C-Spire network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

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**1 IV'S POSITION:** IV disagrees that the jury has to make a separate finding of infringement regarding the accused devices on different carrier networks. It is only necessary to know whether or not the jury finds that the products infringe.

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on Cincinnati Bell network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on iWireless network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on SouthernLinc network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on U.S. Cellular network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

2. Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility has infringed any asserted claim of the '144 patent under the doctrine of equivalents?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

**[IV'S PROPOSED QUESTION**

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_  
(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_  
(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_  
(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_]

**[MOTOROLA'S PROPOSED QUESTION**

For accused devices on Boost Mobile, Virgin Mobile and Sprint network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_  
(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_  
(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_  
(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on C-Spire network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_  
(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_  
(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_  
(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on Cincinnati Bell network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on iWireless network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on SouthernLinc network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on U.S. Cellular network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

3. Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility contributed to the infringement of any asserted claim of the '144 patent?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

**[IV'S PROPOSED QUESTION**

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_]

**[MOTOROLA'S PROPOSED QUESTION**

For accused devices on Boost Mobile, Virgin Mobile and Sprint network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on C-Spire network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on Cincinnati Bell network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on iWireless network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on SouthernLinc network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on U.S. Cellular network:

(A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_

(B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_

(C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_

(D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

4. Has Intellectual Ventures proven, by preponderance of the evidence, that

Motorola Mobility induced the infringement of any asserted claim of the '144 patent?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

**[IV'S PROPOSED QUESTION**

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_]

**[MOTOROLA'S PROPOSED QUESTION**

For accused devices on Boost Mobile, Virgin Mobile and Sprint network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on C-Spire network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on Cincinnati Bell network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on iWireless network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on SouthernLinc network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

For accused devices on U.S. Cellular network:

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

5. Has Motorola Mobility proven, by clear and convincing evidence, that any of the following claims of the '144 patent are invalid based on anticipation?

“Yes” is a finding for Motorola Mobility. “No” is a finding for Intellectual Ventures.

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

6. Has Motorola Mobility proven, by clear and convincing evidence, that any of the following claims of the '144 patent are invalid based on obviousness?

"Yes" is a finding for Motorola Mobility. "No" is a finding for Intellectual Ventures.

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

7. Has Motorola Mobility proven, by clear and convincing evidence, that any of the following claims of the '144 patent are invalid for failing to satisfy the written description requirement?

"Yes" is a finding for Motorola Mobility. "No" is a finding for Intellectual Ventures.

- (A) Claim 10 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 14 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 15 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 41 Yes\_\_\_\_\_ No\_\_\_\_\_

### **'450 PATENT**

8. Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility has literally infringed any asserted claim of U.S. Patent No. 7,409,450 ('450 patent)?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

- (A) Claim 1 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 2 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 3 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 5 Yes\_\_\_\_\_ No\_\_\_\_\_
- (E) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_
- (F) Claim 9 Yes\_\_\_\_\_ No\_\_\_\_\_

9. **[IV'S PROPOSED QUESTION]2** Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility has infringed any asserted claim of the '450 patent under the doctrine of equivalents?

“Yes” is a finding for Intellectual Ventures. “No” is a finding for Motorola Mobility.

- (A) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_]

**[MOTOROLA'S PROPOSED QUESTION: If you find that Motorola Mobility literally infringed claim 1 of the '450 patent, has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility infringed claim 8 of the '450 patent under the doctrine of equivalents?**

“Yes” is a finding for Intellectual Ventures. “No” is a finding for Motorola Mobility.

- (A) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_]

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**2 IV's POSITION:** The Court held that IV can allege doctrine of equivalents for the '450 patent in its March 13, 2015 Order.

10. Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility contributed to the infringement of any asserted claim of the '450 patent?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

- (A) Claim 1 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 2 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 3 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 5 Yes\_\_\_\_\_ No\_\_\_\_\_
- (E) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_
- (F) Claim 9 Yes\_\_\_\_\_ No\_\_\_\_\_

11. Has Intellectual Ventures proven, by preponderance of the evidence, that Motorola Mobility induced the infringement of any asserted claim of the '450 patent?

"Yes" is a finding for Intellectual Ventures. "No" is a finding for Motorola Mobility.

- (A) Claim 1 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 2 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 3 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 5 Yes\_\_\_\_\_ No\_\_\_\_\_
- (E) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_
- (F) Claim 9 Yes\_\_\_\_\_ No\_\_\_\_\_

12. Has Motorola Mobility proven, by clear and convincing evidence, that any of the following claims of the '450 patent are invalid based on anticipation?

“Yes” is a finding for Motorola Mobility. “No” is a finding for Intellectual Ventures.

- (A) Claim 1 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 2 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 3 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 5 Yes\_\_\_\_\_ No\_\_\_\_\_
- (E) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_
- (F) Claim 9 Yes\_\_\_\_\_ No\_\_\_\_\_

13. Has Motorola Mobility proven, by clear and convincing evidence, that any of the following claims of the '450 patent are invalid based on obviousness?

“Yes” is a finding for Motorola Mobility. “No” is a finding for Intellectual Ventures.

- (A) Claim 1 Yes\_\_\_\_\_ No\_\_\_\_\_
- (B) Claim 2 Yes\_\_\_\_\_ No\_\_\_\_\_
- (C) Claim 3 Yes\_\_\_\_\_ No\_\_\_\_\_
- (D) Claim 5 Yes\_\_\_\_\_ No\_\_\_\_\_
- (E) Claim 8 Yes\_\_\_\_\_ No\_\_\_\_\_
- (F) Claim 9 Yes\_\_\_\_\_ No\_\_\_\_\_

We, the jurors, by signing below, indicate our unanimous verdict.

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Jury Foreperson

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Juror

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Juror

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Juror

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Juror

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Juror